

Eric T. Kanefsky
Ralph J. Marra, Jr.
Thomas R. Calcagni
Martin B. Gandelman
CALCAGNI & KANEFSKY LLP
1085 Raymond Blvd., 14th Floor
Newark, New Jersey 07102
Telephone: (862) 397-1796
eric@ck-litigation.com
rmarra@ck-litigation.com
tcalcagni@ck-litigation.com
mgandelman@ck-litigation.com

Daniel L. Brockett (*pro hac vice* forthcoming)
Manisha M. Sheth (*pro hac vice* forthcoming)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010-1601
Telephone: (212) 849-7000
danbrockett@quinnemanuel.com
manishasheth@quinnemanuel.com

Michael Eisenkraft
Laura Posner (*pro hac vice* forthcoming)
Christopher Bateman (*pro hac vice* forthcoming)
COHEN MILSTEIN SELLERS &
TOLL PLLC
88 Pine Street, 14th Floor
New York, NY 10005
Telephone: (212) 838-0177
meisenkraft@cohenmilstein.com
lposner@cohenmilstein.com
cbateman@cohenmilstein.com

Daniel H. Silverman (*pro hac vice* forthcoming)
COHEN MILSTEIN SELLERS &
TOLL PLLC
769 Centre Street, Suite 207
Boston, MA 02130
Tel: (617) 858-1990
dsilverman@cohenmilstein.com

Attorneys for Plaintiff and the Proposed Class

[Additional Counsel on the Signature Page]

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CRIMSON CANDLE SUPPLIES LLC, on
behalf of itself and all others similarly
situated,

Plaintiff,

v.

DSM-FIRMENICH AG, FIRMENICH
INTERNATIONAL SA, FIRMENICH INC.,
AGILEX FLAVORS & FRAGRANCES,
INC., GIVAUDAN SA, GIVAUDAN
FRAGRANCES CORP., GIVAUDAN
FLAVORS CORP., UNGERER &
COMPANY, INC., CUSTOM ESSENCE
INC., INTERNATIONAL FLAVORS &
FRAGRANCES INC., SYMRISE AG,
SYMRISE INC., AND SYMRISE US LLC

Defendants.

No.: 2:23-cv-03875-WJM-JSA

CLASS ACTION

**MOTION DAY: AUGUST 21,
2023**

**CRIMSON CANDLE
SUPPLIES LLC'S NOTICE
OF CROSS-MOTION
FOR CONSOLIDATION AND
THE APPOINTMENT OF
COHEN MILSTEIN
AND QUINN EMANUEL
AS INTERIM CO-LEAD
COUNSEL**

Oral Argument Requested

PLEASE TAKE NOTICE that on August 21, 2023, or such other date as the Court designates, and at a time designated by the Court, the undersigned counsel for plaintiff Crimson Candle Supplies LLC will respectfully move before the Honorable William J. Martini, U.S.D.J., at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street Newark, NJ 07102 for an Order: (1) consolidating the Related Actions;¹ (2) appointing Cohen Milstein Sellers & Toll PLLC and Quinn Emanuel Urquhart & Sullivan, LLP as Interim Co-Lead Counsel; (3) appointing Calcagni & Kanefsky LLP as Liaison Counsel; and (4) granting such other and further relief as the Court may deem just and proper.

The undersigned intends to rely upon the annexed Brief and Declaration of Eric T. Kanefsky, Esq.

A proposed Order accompanies this motion.

Dated: July 24, 2023

Respectfully submitted,

/s/ Eric Kanefsky

Eric T. Kanefsky (Atty No. 024292002)

Ralph J. Marra, Jr. (Atty No. 020761978)

Thomas R. Calcagni (Atty No. 044801997)

Martin B. Gandelman (Atty No. 015592011)

CALCAGNI & KANEFSKY LLP

¹ The related actions to this case are *Candle Shop of the Poconos, Inc. v. Givaudan S.A.*, No. 23-cv-03049 (D.N.J.); *B&E Assocs. v. Firmenich SA*, No. 23-cv-03050 (D.N.J.); *Demeter F.L. Inc. v. Int'l Flavors & Fragrances Inc.*, No. 23-cv-03265 (D.N.J.); *Hanna's Candle Co. v. Int'l Flavors & Fragrances Inc.*, No. 23-cv-03266 (D.N.J.); and *Cospro Dev. Corp. v. Int'l Flavors & Fragrances*, No. 23-cv-03368, (D.N.J.).

1085 Raymond Boulevard, 14th Floor
Newark, New Jersey 07102
Telephone: (862) 397- 1796
Fax: (862) 902-5458
eric@ck-litigation.com
rmarra@ck-litigation.com
tcalcagni@ck-litigation.com
mgandelman@ck-litigation.com
*Counsel for Plaintiff and the Proposed
Class*

Michael Eisenkraft
Laura Posner (*pro hac vice* forthcoming)
Christopher Bateman (*pro hac vice*
forthcoming)
COHEN MILSTEIN SELLERS & TOLL
PLLC
88 Pine Street, 14th Floor
New York, NY 10005
Telephone: (212) 838-0177
Fax: (212) 838-7745
meisenkraft@cohenmilstein.com
lposner@cohenmilstein.com
cbateman@cohenmilstein.com

Zachary Krowitz (*pro hac vice* forthcoming)
Nina Jaffe-Geffner (*pro hac vice*
forthcoming)
COHEN MILSTEIN SELLERS & TOLL
PLLC
1100 New York Ave NW, Fifth Floor
Washington, DC 20005
Tel: (202) 408-4600
Fax: (202) 408-4699
zkrowitz@cohenmilstein.com
njaffegeffner@cohenmilstein.com

Daniel H. Silverman (*pro hac vice*
forthcoming) COHEN MILSTEIN
SELLERS & TOLL PLLC
769 Centre Street, Suite 207
Boston, MA 02130
Tel: (617) 858-1990
Fax: (202) 408-4699
dsilverman@cohenmilstein.com
*Counsel for Plaintiff and the Proposed
Class*

Daniel L. Brockett (*pro hac vice*
forthcoming)
Manisha M. Sheth (*pro hac vice*
forthcoming)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
51 Madison Avenue, 22nd Floor
New York, NY 10010-1601
Telephone: (212) 849-7000
Fax: (212) 849-7100
danbrockett@quinnemanuel.com
manishasheth@quinnemanuel.com

Jeremy D. Andersen (*pro hac vice*
forthcoming)
QUINN EMANUEL URQUHART &
SULLIVAN, LLP

865 South Figueroa Street, 10th Floor
Los Angeles, California 90017
Telephone: (213) 443-3000
Fax: (213) 443-3100
jeremyandersen@quinnemanuel.com
*Counsel for Plaintiff and the Proposed
Class*

Curt Lockhart (*pro hac vice* forthcoming)
LOCKHART IP
68 S 200 W A
Bountiful, Utah 84010
Telephone: (713) 487-6624
curt@usipconsulting.com
*Counsel for Plaintiff and the Proposed
Class*